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*Attorneys for Plaintiff Green Renewable Organic and  
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Holdings and W. Quay Hays*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

GREEN RENEWABLE ORGANIC AND  
WATER HOLDINGS, LLC D/B/A GROW  
HOLDINGS AND W. QUAY HAYS,

Plaintiffs,

v.

BLOOMFIELD INVESTMENTS, LLC and  
DOES 1 through 20, inclusive,

Defendants.

Case No. 4:21-cv-07181-HSG

**STIPULATION TO EXTEND TIME  
FOR PLAINTIFFS TO RESPOND TO  
MOTION TO CONFIRM AND FOR  
DEFENDANT TO REPLY;  
ORDER**

Judge: Hon. Haywood S. Gilliam, Jr.

1 WHEREAS, on August 18, 2021, plaintiffs Green Renewable Organic and Water  
2 Holdings, LLC d/b/a Grow Holdings (“Grow Holdings”) and W. Quay Hays served a complaint  
3 filed in the Superior Court of California for the County of Napa seeking declaratory relief on  
4 defendant Bloomfield Investments, LLC (“Bloomfield”); and

5 WHEREAS, on September 16, 2021, Bloomfield removed the state court action to the  
6 district court; and

7 WHEREAS, on September 23, 2021, Bloomfield filed a motion to dismiss the complaint  
8 with a hearing date noticed for February 10, 2022; and

9 WHEREAS, on October 6, 2021, the parties stipulated and agreed to extend the deadline  
10 for plaintiffs’ response to the motion to dismiss to October 21, 2021; and

11 WHEREAS, the Court accepted the parties’ stipulation and ordered that plaintiffs’  
12 deadline for response to the motion to dismiss be extended to October 21, 2021; and

13 WHEREAS, the parties stipulated and agreed to permit plaintiffs to file an amended  
14 complaint in lieu of a response to the motion to dismiss on October 21, 2021, and stipulated and  
15 agreed to extend Bloomfield’s deadline to respond to the amended complaint to November 12,  
16 2021; and

17 WHEREAS, the Court accepted the parties’ stipulation and ordered that plaintiffs could  
18 file an amended complaint in lieu of a response to the motion to dismiss on October 21, 2021, and  
19 ordered that Bloomfield’s deadline to response to the amended complaint be extended to  
20 November 12, 2021; and

21 WHEREAS, Bloomfield filed an answer to the amended complaint and a motion to  
22 confirm foreign arbitral awards on November 12, 2021, with a hearing date noticed for March 24,  
23 2022; and

24 WHEREAS, plaintiffs’ response to the motion to confirm is due on November 26, 2021;  
25 and

26 WHEREAS, the parties agree that additional time to brief the motion to confirm is  
27 appropriate and will allow adequate time prior to the March 24, 2022 hearing date;  
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1 IT IS THEREFORE STIPULATED AND AGREED that plaintiffs' deadline to respond to  
2 the motion to confirm be extended to December 10, 2021;

3 IT IS FURTHER STIPULATED AND AGREED that Bloomfield's deadline to reply to  
4 the response to the motion to confirm be extended to December 23, 2021.

5  
6 Dated: November 24, 2021

7 GREEN RENEWABLE ORGANIC AND  
8 WATER HOLDINGS, LLC D/B/A GROW  
9 HOLDINGS AND W. QUAY HAYS

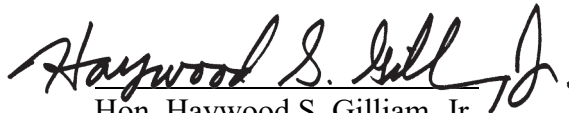
10 By: /s/ Mark D. Flanagan  
11 Mark D. Flanagan (SBN 130303)

12 BLOOMFIELD INVESTMENTS, LLC and  
13 DOES 1 through 20, inclusive

14 By: /s/ George R. Morris  
15 George R. Morris (SBN 249930)

16 IT IS SO ORDERED.

17 Date: November 29, 2021

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19   
20 Hon. Haywood S. Gilliam, Jr.  
21 United States District Judge  
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